

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CIVIL NO. 3:17-cv-00643-FDW-DCK**

**ERIC KINSINGER and DENISE
KINSINGER,**

Plaintiffs,

vs.

**SMARTCORE, LLC;
SMARTCORE ELECTRICAL, LLC;
SMARTCORE ELECTRICAL
SERVICES, LLC; SMARTCORE, LLC
GROUP HEALTH BENEFIT PLAN;
JARED CRAFTON CROOK;
STEVEN MATTHEW GOOD;
WILLIAM H. WINN, JR.; STAR
MARKETING AND ADMINISTRATION, INC.)
d/b/a STARMARK, INC.; TRUSTMARK LIFE)
INSURANCE COMPANY; and TRUSTMARK)
INSURANCE COMPANY,**

Defendants.

**DECLARATION OF
DEBORAH ANNE GOOD**

I, Deborah Anne Good, make the following declaration pursuant to 28 U.S.C. § 1746:

1. I am a former project manager for SmartCore, LLC, a defendant in this action. I am over eighteen (18) years of age and my statements herein are based on personal knowledge.

2. In my role as a project manager, I was regularly present in the SmartCore

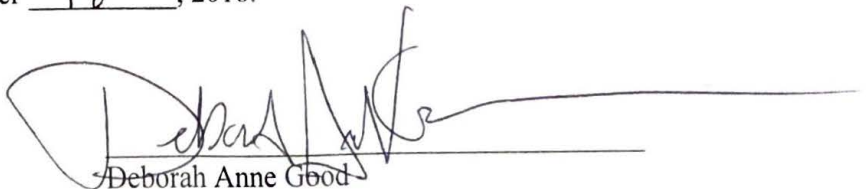
office, and I was personally acquainted with Eric Kinsinger, with whom I interacted regularly at the office. At various times, Mr. Kinsinger informed me that his wife Denise was scheduled to undergo a medical procedure in January of 2016. Specifically, a hysterectomy.

3. The day before the procedure, Mr. Kinsinger and I were in a project meeting when he received a call from his wife's doctor telling him the procedure that was scheduled for the next day was not approved by insurance. He openly had the conversation with the doctor's office in the conference room where our project meeting was taking place.

4. Mr. Kinsinger then stepped out of the meeting to "call the insurance company". At that time, we (Nathalie Dillahunt, Jared Crook and myself) paused the project meeting and opened the conference room door. As we were waiting for Mr. Kinsinger's return, we could overhear Mr. Kinsinger speaking with a Starmark representative. Mr. Kinsinger shared with us after he returned to the meeting that Starmark was denying coverage for the procedure. Mr. Kinsinger proceeded to then tell the three of us in the conference room that he and Mrs. Kinsinger planned to proceed with the procedure anyway even though they knew it would not be covered by SmartCore's insurance or health benefits plan due to Starmark's denial of coverage. I assumed it was denied due to a lack of medical necessity as Mr. Kinsinger stated that she was "getting a hysterectomy so she wouldn't be so bitchy every month."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2018.



Deborah Anne Good